

# EXHIBIT C

**STIPULATION REGARDING FILING OF AMENDED COMPLAINT**

Plaintiffs and Defendants Meta Platforms, Inc.; TikTok, Inc.; TikTok, LLC; TikTok, Ltd.; ByteDance Inc.; ByteDance, Ltd.; Snap Inc.; YouTube, LLC; Google LLC; and Alphabet Inc. (“Defendants”) (together, the “Stipulating Parties”) hereby stipulate as follows:

**STIPULATION**

WHEREAS, pursuant to this Court’s order, ECF 111, Plaintiffs filed a Master Complaint on February 14, 2023;

WHEREAS this Court ordered Defendants to file motion(s) to dismiss the Master Complaint by April 17, 2023, with oppositions due on June 1, 2023 and replies due on June 30, 2023, ECF 111;

WHEREAS Plaintiffs are, concurrent with the filing of this stipulation, filing an Amended Master Complaint making changes to a limited number of paragraphs of the Master Complaint;

WHEREAS a redline reflecting these changes is attached to that filing as Exhibit 2;

WHEREAS Defendants consent to the filing of the Amended Complaint, Fed. R. Civ. P. 15(a)(2);

WHEREAS the Stipulating Parties agree that the filing of the Amended Complaint shall not affect the briefing schedule on Defendants’ forthcoming motion(s) to dismiss, and Defendants must therefore still file the motion(s) to dismiss on April 17, 2023;

**IT IS SO STIPULATED**

Respectfully submitted,

/s/ Previn Warren

Previn Warren

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**ATTESTATION**

I, Previn Warren, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: April 14, 2023

By: /s/ Previn Warren  
Previn Warren